

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

TERESA L. PENNINGTON,

Plaintiff,

v.

Civil Action No. 1:10cv112

MIDLAND CREDIT MANAGEMENT, INC.,

Defendant.

**DEFENDANT MIDLAND CREDIT MANAGEMENT, INC.'S
MOTION FOR PROTECTIVE ORDER**

Defendant Midland Credit Management, Inc. ("Defendant"), by counsel, pursuant to Rules 26 and 37(a) of the Federal Rules of Civil Procedure and Local Rule 37, hereby moves for a protective order permitting it until on or before July 6, 2010 to provide Plaintiff with its good faith estimate of net worth, limiting Plaintiff's discovery of financial information to Defendant's good faith estimate of its current net worth, prohibiting Plaintiff from discovering the documents generated by Defendant to develop its good faith estimate of its current net worth, specifying that Defendant's estimate of its current net worth should be treated as "attorneys-eyes-only" unless Plaintiff proves a willful violation of the Fair Credit Reporting Act, and specifying that any deposition testimony on this topic should be filed under seal for the reasons set forth in Defendant's accompanying Memorandum in Support filed simultaneously.

Defendant certifies in compliance with Local Civil Rule 7(E) and 37(E) that it has attempted in good faith to resolve the discovery matters at issue and confer with Plaintiff to resolve this Motion without the necessity of Court involvement.

WHEREFORE, Defendant, by counsel, respectfully requests that the Court enter an Order: (1) granting its Motion for Protective Order; (2) granting it the relief requested in its

accompanying memorandum in support; and (3) granting it such further relief as the Court deems appropriate.

MIDLAND CREDIT MANAGEMENT, INC.

By: /s/ John C. Lynch
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of June, 2010, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which then sent a notification of such filing (NEF) to the following:

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